

CAHILL GORDON & REINDEL LLP
EIGHTY PINE STREET
NEW YORK, NY 10005-1702

HELENE R. BANKS
ANIRUDH BANSAL
DAVID L. BARASH
LANDIS C. BEST
BRADLEY J. BONDI
BROCKTON B. BOSSON
JAMES J. CLARK
CHRISTOPHER W. CLEMENT
LISA COLLIER
AYANO K. CREED
SEAN M. DAVIS
STUART G. DOWNING
ADAM M. DWORKIN
ANASTASIA EFIMOVA
JENNIFER B. EZRING
HELENA S. FRANCESCHI
JOAN MURTAGH FRANKEL

JONATHAN J. FRANKEL
ARIEL GOLDMAN
JASON M. HALL
WILLIAM M. HARTNETT
NOLA B. HELLER
CRAIG M. HOROWITZ
DOUGLAS S. HOROWITZ
TIMOTHY B. HOWELL
DAVID G. JANUSZEWSKI
ELAI KATZ
BRIAN S. KELLEHER
RICHARD KELLY
CHÉRIE R. KISER*
JOEL KURTZBERG
TED B. LACEY
MARC R. LASHBROOK
ALIZA R. LEVINE

TELEPHONE: (212) 701-3000
WWW.CAHILL.COM

1990 K STREET, N.W.
WASHINGTON, DC 20006-1181
(202) 862-8900

CAHILL GORDON & REINDEL (UK) LLP
24 MONUMENT STREET
LONDON EC3R 8AJ
+44 (0) 20 7920 9800

WRITER'S DIRECT NUMBER

JOEL H. LEVITIN
GEOFFREY E. LIEBMANN
BRIAN T. MARKLEY
MEGHAN N. McDERMOTT
WILLIAM J. MILLER
NOAH B. NEWITZ
DAVID R. OWEN
JOHN PAPACHRISTOS
LUIS R. PENALVER
KIMBERLY PETILLO-DÉCOSSARD
SHEILA C. RAMESH
MICHAEL W. REDDY
OLEG REZZY
THORN ROSENTHAL
TAMMY L. ROY
JONATHAN A. SCHAFFZIN
MICHAEL A. SHERMAN

DARREN SILVER
JOSIAH M. SLOTNICK
RICHARD A. STIEGLITZ JR.
ROSS E. STURMAN
SUSANNA M. SUH
ANTHONY K. TAMA
JONATHAN D. THIER
SEAN P. TONOLLI
JOHN A. TRIPODORO
GLENN J. WALDRIP, JR.
HERBERT S. WASHER
MICHAEL B. WEISS
DAVID WISHENGRAD
COREY WRIGHT
JOSHUA M. ZELIG
DANIEL J. ZUBKOFF

* ADMITTED IN DC ONLY

(212) 701-3357

April 6, 2020

Re: *Delos Reyes v. Abundant Nursing, Inc. et al*, 19 Civ. 02596 (E.D.N.Y.)
(AMD) (RLM)

Dear Judge Donnelly:

Together with The Legal Aid Society, we write as counsel for plaintiff Mark Delos Reyes (“Mr. Delos Reyes”) in the above-captioned action (the “Lawsuit”). Pursuant to this Court’s Individual Rule of Practice 4(A), we respectfully submit this letter in response to Mr. Fingold’s request for a pre-motion conference.

Per Judge Mann’s September 25, 2019 Scheduling Order, the deadline to amend pleadings and add new parties in this Lawsuit was November 15, 2019. [ECF No. 27] Under Federal Rule of Civil Procedure 16(b)(4), a scheduling order may only be modified for good cause and with the judge’s consent, and does not require the consent of the opposing party. However, in light of EllenGrace Flores’ (“Ms. Flores”) former status as a *pro se* defendant, we write to inform the Court that, without waiving any arguments or defenses, we do not oppose Mr. Fingold’s request to amend Ms. Flores’ Answer to the Complaint filed on July 9, 2019. [ECF No. 17]

We appreciate Your Honor’s consideration of this matter and are available at Your Honor’s convenience to discuss this matter.

Respectfully submitted,

/s/ Caroline Saucier
Caroline Saucier

The Honorable Ann M. Donnelly
United States District Judge for the Eastern District of New York
225 Cadman Plaza East, Room 4GN
Brooklyn, NY 11210

cc:

Joshua Fingold Esq.
10 Rockefeller Plaza
16th Floor
New York, New York 10020

Amy Hong, Esq.
The Legal Aid Society
199 Water Street, 3rd Floor
New York, New York 10038

MacDonald S. Tudeme
38 Iagrossi Drive
Waterbury, CT 06705

Via ECF